

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

SHANE GRESSEL,

Plaintiff,

v.

Case No. 15-CV-180

JAMES THORPE, et al.,

Defendants.

DEFENDANTS' RULE 26(a)(3)(A) AND (B) DISCLOSURES

Defendants, by their attorneys, Attorney General Brad D. Schimel and Assistant Attorney General Shannon A. Conlin, submit their Rule 26(a)(3)(A) and (B) Disclosures.

NAMES OF POTENTIAL WITNESSES

1. Plaintiff (adversely)
2. All individuals who were defendants at any time in this case, including, but not limited to, the following:
 - a. James Thorpe
c/o Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857
608-266-1677

- b. Kathryn Lovell
c/o Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857
608-266-1677
- c. Karen Anderson
c/o Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857
608-266-1677
- d. Michael Meisner
c/o Wisconsin Department of Justice
Post Office Box 7857
Madison, WI 53707-7857
608-266-1677

3. Other potential witnesses:

- a. Dr. Man Lee
- b. Dr. William Giswold
- c. Maryland Birkholz
- d. Dr. Gary Maier
- e. Dr. Robert Vickery

Each of the above-listed witnesses are or were employed by the Department of Corrections during the relevant time, and can be contacted through the Wisconsin Department of Justice:

Post Office Box 7857
Madison, WI 53707-7857
608-266-1677

4. Witness potentially needed for authentication of documents: Isaac Hart and any medical provider providing

treatment for Plaintiff from January 11, 2011 to July 1, 2013.

The above-listed witnesses may be contacted through defense counsel.

The defendants reserve the right to call any of plaintiff's witnesses adversely. In addition, based upon the presentation of plaintiff's case, defendants reserve the right to call rebuttal witnesses.

EXHIBITS

The Defendants' exhibit list will be filed as a separate document on today's date.

Dated this 20th day of September, 2017.

Respectfully submitted,

BRAD D. SCHIMEL
Wisconsin Attorney General

s/Shannon A. Conlin
Shannon A. Conlin
Assistant Attorney General
State Bar #1089101

Attorneys for Defendants Thorpe
and Anderson

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 266-1677
(608) 267-8906 (Fax)
conlinsa@doj.state.wi.us